

# **EXHIBIT A**

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

<b>In re:</b>	)	<b>Chapter 11</b>
	)	
<b>W. R. GRACE &amp; CO., <u>et al.</u></b>	)	<b>Case No. 01-01139 (JKF)</b>
	)	
<b>Debtors.</b>	)	<b>Jointly Administered</b>

**DEBTORS OBJECTIONS TO THE CROSS-QUESTIONS OF THE OFFICIAL  
COMMITTEE OF ASBESTOS PERSONAL INJURY CLAIMANTS UPON THE  
EAGLE-PICHER IND., INC., PERSONAL INJURY SETTLEMENT TRUST**

On or about October 12, 2007, the Debtors served the Eagle-Picher Ind., Inc., Personal Injury Settlement Trust with a deposition upon written questions (the "Deposition"). On October 26, 2007, the Official Committee of Asbestos Personal Injury Claimants (the "ACC") propounded cross-questions to the Deposition (the "Cross Questions"). Pursuant to Federal Rule of Civil Procedure 32, the Debtors reserve their rights to assert all evidentiary objections to the Cross Questions at the time of trial. Notwithstanding, pursuant to Federal Rule of Civil Procedure 31(a)(4), the Debtors hereby assert the following objections to the Cross Questions, and present the following Re-Direct questions to the Eagle-Picher Ind., Inc., Personal Injury Settlement Trust.

**Objections to Specific ACC Cross-Questions**

**Objections to Written Question Nos. 4, 5, 6, and 7:** Fairly read, these questions call for simple "yes or no" answers. However, to the extent that any or all of the questions are interpreted as calling for narrative answers, the Debtors object to the breadth of the questions and their calling for narrative answers, and the Debtors would move to strike any answer(s) other than "yes" or "no."

**Re-Direct Questions for the Eagle-Picher Ind., Inc., Personal Injury Settlement Trust**

**Written Deposition Question 8:** In preparing to answer and answering Written Question Nos. 4-7, did the Eagle-Picher Ind., Inc., Personal Injury Settlement Trust, the person answering on behalf of the Eagle-Picher Ind., Inc., Personal Injury Settlement Trust, or anyone assisting with the response to the question consult with any representative of or lawyer for: the ACC, Legal Representative for Future Claimants, any other party to or claimant in the Grace chapter 11 proceeding, the Eagle-Picher Ind., Inc., Personal Injury Settlement Trust TAC, Trustees of the Eagle-Picher Ind., Inc., Personal Injury Settlement Trust, and/or any lawyer or law firm that represents asbestos plaintiffs? If so, identify all such persons and the date(s) of communication, length, detailed subject matter, and any documents created, reviewed or exchanged.

**Answer:**

**Written Deposition Question 9:** In preparing to answer and answering Written Question Nos. 4-7, who, if anyone, did the person responding consult with? Please identify date(s) of communication, length, detailed subject matter (unless the person was counsel to the Trust rendering legal advice), and any documents created, reviewed or exchanged.

**Answer:**

Dated: November 9, 2007

KIRKLAND & ELLIS LLP

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